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19 **UNITED STATES DISTRICT COURT**

20 **FOR THE DISTRICT OF NEVADA**

21 DOUGLAS BULL,

22 Plaintiff,

23 vs.

24 ELDORADO RESORTS CORPORATION, a
25 Florida corporation; MICHAEL MARRS;
26 BRUCE POLANSKY; KRISTEN BECK;
27 DOMINIC TALEGHANI; JAMES
28 GRIMES; AND DOES 1-50, inclusive;

Defendants.

Case No.: 2:15-cv-00756-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE DISPOSITIVE
MOTIONS AND RESPONSES AND
REPLIES THERETO**

(FIRST REQUEST)

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1 and 26-4, Plaintiff Douglas Bull ("Plaintiff") and Defendants Eldorado Resorts Corporation ("Eldorado") and Michael Marrs ("Marrs") (collectively "Defendants"), by and through their undersigned counsel, hereby stipulate and agree to this first request for extension of time for the parties to file dispositive motions in this action, along with related responses and replies. Pursuant to the Court's July 1, 2016, Order for

1 Extension of Discovery Deadlines (ECF No. 47), the current deadline for filing dispositive motions
 2 in this case is August 30, 2016 (*see id.* at 6). The parties have completed all discovery in this
 3 matter, and good cause exists for the proposed extension based upon the following:

4 On August 11, 2016, the parties participated in an Early Neutral Evaluation Conference
 5 (“ENE”) before the Honorable Magistrate Judge George Foley, Jr., in the related case of *Villarreal*
 6 *v. Eldorado Resorts Corp. et al.*, Case No. 2:14-cv-01415-RFB-PAL. (*See* Mins. of Proceedings,
 7 ECF No. 97.) Although no settlement was reached, the parties advised the Court that a global
 8 settlement conference and continuation of the ENE session would potentially advance the goal of
 9 settlement. The Court has, therefore, set a global settlement conference for October 12 and 13,
 10 2016, again before Magistrate Judge Foley. (*See id.*) An extension of the deadline to file
 11 dispositive motions, responses, and replies in this case similarly advances the goal of settlement by
 12 allowing the parties to conserve resources pending those settlement discussions and to streamline
 13 and focus the litigation and issues leading up to that conference. Based upon the foregoing, the
 14 parties have agreed that the dispositive motion deadlines should be extended in the following
 15 manner:
 16

- 17 • Defendants shall file their dispositive motions no later than **September 15, 2016**;
- 18 • Plaintiff shall file any response to Defendants' motion no later than **November 15,**
 19 **2016**;
- 20 • Defendants shall file their reply no later than **December 15, 2016**.

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This stipulation is not brought for purposes of delay or any other improper purpose.

Dated this 12th day of August, 2016.

Dated this 12th day of August, 2016.

WATKINS & LETOFSKY, LLP

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/s/ Dan Watkins

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

August 17, 2016

DATED